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12 *Bellagio, LLC dba Bellagio Hotel and Casino and*
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14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 DIANA HOLMES,
17
18 Plaintiff,

19 vs.

20 BELLAGIO, LLC, a Nevada corporation;
21 MGM RESORTS INTERNATIONAL, a
22 foreign corporation; *et al.*,

23 Defendants.

Case No.: 2:20-cv-00576-RFB-BNW

**STIPULATION, REQUEST, AND ORDER
EXTENDING TIME TO ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

24 Plaintiff Diana Holmes ("Plaintiff") and Defendants Bellagio, LLC d/b/a/ Bellagio Hotel and
25 Casino ("Bellagio") and MGM Resorts International ("MGMRI") (collectively, "Defendants"), by and
26 through their counsel of record, jointly submit this Stipulation, Request, and Order Extending Time to
27 Answer or Otherwise Respond to Plaintiff's Complaint (the "Stipulation"). This Stipulation is made in
28 accordance with LR IA 6-1, LR IA 6-2, and LR 7-1 of the Local Rules of this Court. This is the first
request for an extension of time to file an answer or otherwise respond to Plaintiff's Complaint.

Plaintiff's Complaint was filed on March 6, 2020. Defendants moved to remove this case to
Federal Court on March 23, 2020. No scheduling order has been entered in this case. The instant
extension is requested because of State-wide and National events involving the Coronavirus (COVID-
19) pandemic, including the complete shutdown of Defendants' operations.

1 Upon agreement by and between the parties, the undersigned respectfully requests this Court
2 to grant an extension until May 1, 2020 for Defendants to file an answer or otherwise respond to
3 Plaintiff's Complaint. By entering into this Stipulation, none of the parties waive any rights they have
4 under statute, law, or rule.

5
6 Dated: April 1, 2020

7 **JONES LOVELOCK**

**BELLAGIO, LLC AND MGM RESORTS
INTERNATIONAL**

8
9 By: /s/ Nicole Lovelock

By: /s/ Kelly Kichline

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Bellagio, LLC dba Bellagio Hotel and Casino
and MGM Resorts International

19
20 **ORDER**

21 **IT IS SO ORDERED.**

22 
23 _____
24 UNITED STATES MAGISTRATE JUDGE

25 Dated: April 2, 2020

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4 **CERTIFICATE OF SERVICE**

5 I HEREBY CERTIFY that on April 1, 2020, I electronically filed a copy of the foregoing with
6 the Clerk of Court using the CM/ECF system, which sent a notification of such filing (NEF) to the
7 registered participants as identified on the NEF to receive electronic service, including:

8
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10 Stephen A. Davis, Esq.
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14 /s/ Kelly Kichline
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17 *Attorneys for Defendants.*
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